

From: [Coltrain, Katrina](#)
To: [Benton, Marvin](#)
Cc: [Atkins, Blake](#); [Peycke, Mark](#); [Turner, Philip](#)
Subject: Wilcox Soil around the ODOT Bridge - Request for Response (06GG LC)
Date: Monday, February 29, 2016 2:36:00 PM

Marvin, Please see below a summary of the issue related to Wilcox and the ODOT Bridge project. ODOT sampled the material and the results show some exceedances of the residential soil screening risk levels. ODEQ and I are of the opinion that if the data are below the residential soil screening levels, then no further action related to the soil is necessary based on risk and the soil can remain in place. For soil exceeding the residential soil screening level, the soil needs to be removed until the residential soil screening levels are reached. Or, ODOT can perform a risk assessment to determine the appropriate risk number and based on that number determine whether soil needs to be removed.

Is there a legal/regulatory reason why all of the soil, regardless of whether it exceeds the residential screening number or not, should be removed and disposed of in an offsite landfill? Can the soil remain in place if it falls below the residential screening number?

- Wilcox soil was removed from the site and used as backfill by the contractor constructing the bridge.
- The Wilcox soil has not been characterized. We do not know the concentrations of contaminants in the soil.
- The area where the soil was removed will be investigated as part of the RI.
- We have not completed a risk assessment and do not have cleanup levels.
- Since we do not have cleanup levels, soil data collected by ODOT are compared against the residential screening levels.
- The residential soil screening levels are being used because (1) some of the area where soil was placed is in residential yards (ditch area), (2) below residential soil screening levels allows for unlimited use/unrestricted exposure-no ICs/maintenance/5-yr reviews, and (3) these numbers are conservative 10-6 numbers.
- We do not have background levels to compare the contaminants.
- The residential soil screening levels represent conservative levels developed using risk assessment guidance. They are considered by the agency to be protective for humans (including sensitive groups) over a lifetime of exposure. When doing a risk assessment, data that fall below the residential screening levels are not further evaluated in a risk assessment.

thanks

Katrina Higgins-Coltrain
Remedial Project Manager
US EPA Region 6
LA/OK/NM Section (6SF-RL)
1445 Ross Avenue

Dallas, Texas 75202
214-665-8143